

Nelson S. Cardella, Claim number: 363. Case number 23-62260-dwh11.

December 16th, 2024

Clerk of Court
1050 SW 6th Ave #700
Portland, OR 97204

Subject: Request for Production to Vans Aircraft Inc. (Claim number: 363. Case number 23-62260-dwh11).

INSTRUCTIONS AND DEFINITIONS

1. "Documents" shall mean all written or graphic matter of every kind or description, however produced or reproduced, whether draft or final, original or reproduction, signed or unsigned, and regardless of whether approved, signed, sent, received, redrafted, or executed, including but not limited to: written communications, letters, correspondence, facsimiles, e-mail, memoranda, minutes, notes, films, recordings of any type, transcripts, contracts, agreements, purchase or sales orders, reports, studies, bills, receipts, checks, checkbooks, invoices, requisitions or material similar to any of the foregoing however denominated, by whomever prepared, and to whomever addressed, which are in your possession, custody or control.
2. If more than one copy of a requested document exists, this request includes a request for production of all non-identical copies.

DOCUMENTS TO BE PRODUCED

1. Any and all internal or external documents, studies, statements, correspondence, engineering reports, notes or records, photographs, charts, pictures, images, video, diagrams, drawings, descriptions, forms, check-lists, processes or other documents of any description pertaining to Laser Cut Parts (LCP's).
2. Any and all contractual or legal agreements between Van's Aircraft, Inc. and suppliers, producers, manufacture's or engineering firms.
3. Any charts or other documents detailing the hierarchical and/or organizational structure of Van's Aircraft, Inc.
4. Any and all photographs, charts, pictures, images, video, diagrams, drawings, descriptions, forms, check-lists, processes or other documents that refers or relates to the inventory control system of Van's Aircraft, Inc.
5. Any and all photographs, charts, pictures, images, video, diagrams, drawings, descriptions, forms, check-lists, processes or other documents that refers or relates to the quality control system of Van's Aircraft, Inc.
6. Any and all manuals, handbooks, check-lists, operating guidelines, policies, procedures, pamphlets, memos, or other documents relating to the study, adoption and incorporation of Laser Cut Parts (LCP's) into production.
7. Any and all manuals, handbooks, check-lists, operating guidelines, policies, procedures, pamphlets, memos, or other documents relating to the study and the testing of Laser Cut Parts (LCP's).

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8. All training and education materials provided to employees to ensure proper adherence and implementation of quality checks and inspections of all aircraft parts produced to include of Laser Cut Parts (LCP's).

9. Any and all of the documented actual flight time (hours of flight) of Laser Cut Parts (LCP's) by aircraft model.

10. Any and all results, recommendations, safety concerns, check-lists, memos, or other documents relating to the documented flight time (hours of flight) of Laser Cut Parts (LCP's) by aircraft model.

11. The names of any and all employees, contractors, 3rd party representatives or anyone that was involved in the manufacture, design, development and implementations of the Laser Cut Parts (LCP's).

Respectfully submitted,



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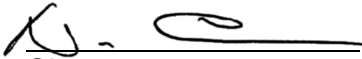
December 16th, 2024

Subject: Certificate of Service.

I certify that on 12/16/2024 (service date) copies of the Request for Production to Vans Aircraft Inc. Claim number: 363. Case number 23-62260-dwh11 were mailed to:

Tonkon Torp LLP
Att: Timothy J. Conway
888 SW Fifth Ave., Ste 1600
Portland, OR 97204

Nelson S. Cardella
Printed Name


Signature